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August 1, 2014

The Honorable Rya W. Zobel, U.S.D.J.
U.S. District Court, for District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, MA 02210

In re New England Compounding Pharmacy, Inc. Products Liability Litigation
Docket No. 1:13-md-2419-RWZ

Re: Ramos v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10410
AND
Rivera v. New England Compounding Pharmacy, Inc. et al., Docket No. 13-cv-10412

Dear Judge Zobel:

Plaintiffs, Ramos and Rivera, by and through their attorneys, Saltz, Mongeluzzi, Barrett & Bendesky, submits this letter pursuant to LR, D. Mass. 7.1(b)(3) to respectfully request this Honorable Court to consider the attached 5-page Response to Dr. Bhagat's Reply Brief in Further Support of his Motion to Dismiss Plaintiffs' Complaints. This Response Brief is necessary to clarify important misstatements in Dr. Bhagat's Reply Brief. Namely: (1) Dr. Bhagat incorrectly argues that he was named as a defendant in the Master Complaint; and (2) even assuming, *arguendo*, that Dr. Perkins is a defendant, her Motion to Dismiss is contrary to the spirit of N.J.Stat.Ann. § 2a:53a-27.

For the foregoing reasons, Plaintiffs respectfully request leave to file the attached 5-page Response to Dr. Bhagat's Reply Brief.

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Very truly yours,

SALTZ, MONGELUZZI, BARRETT & BENDESKY, P.C.

/s/Michael F. Barrett
MICHAEL F. BARRETT
MARY T. GIDARO

cc: Joseph R. Lang, Esq.
Stephen A. Grossman, Esq.